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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
SHEENA ELKIND,)
)
)
Defendant.)
_____)

Case No.: 2:20-mj-00709-BNW-1

**STIPULATION TO CONTINUE
PRELIMINARY EXAMINATION DATE
(FOURTEENTH REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, District of Nevada, and Edward G. Veronda Assistant United States Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel for SHEENA ELKIND, that the Preliminary Examination hearing currently scheduled for November 3rd, 2022 at 2:00 p.m., be vacated and set to a date and time convenient to this court but no sooner than sixty (60) days.

The Stipulation is entered into for the following reasons:

1. The parties are currently in the final stages of pre-indictment negotiations meant to resolve this case by the filing of an Information.
2. Ms. ELKIND is on Pretrial Release and does not object to the continuance.
3. The parties agree to the continuance.

- 1 4. The additional time requested herein is not sought for purposes of delay, but
2 merely to allow counsel for defendant sufficient time within which to be able to
3 effectively and complete investigation of the discovery materials provided.
4 5. Denial of this request for continuance would result in a miscarriage of justice.
5 6. The additional time requested by this Stipulation is excludable in computing the
6 time within which the trial herein must commence pursuant to the Speedy Trial
7 Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors
8 under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).
9 7. This is the fourteenth request for a continuance of the preliminary hearing date
10 in this case.

11
12 DATED this 28th day of October 2022.

13 GABRIEL L. GRASSO, P.C.
14 Counsel for SHEENA ELKIND

 JASON M. FRIERSON
 United States Attorney

15 By /s/ Gabriel L. Grasso
16 GABRIEL L. GRASSO, ESQ.

 By /s/ Edward G. Veronda
 Assistant United States Attorney

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**UNITED STATES DISTRICT COURT
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**FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties are currently in the final stages of pre-indictment negotiations meant to resolve this case by the filing of an Information.
2. Ms. ELKIND is on Pretrial Release and does not object to the continuance.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively resolve this case, taking into account the exercise of due diligence.

ORDER

IT IS THEREFORE ORDERED that the Preliminary Examination hearing currently scheduled for November 3rd, 2022, at 2:00 p.m., be vacated and continued to January 13, 2022 at 1:00 p.m.

DATED this 2nd day of November, 2022.



HONORABLE BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE